APPENDIX C

REGULATORY AND CORPORATE

EXTERNAL NOTIFICATION GUIDANCE

FOR RESPONSE COORDINATORS

APPENDIX C
External Notification
-Regulatory and Corporate-

Environmental Regulatory Notification Procedures

- Notification Instructions
- Release Category and Reportable Quantity – List
- Estimating Release Quantities
- Regulatory Agency and Corporate Phone Numbers
- Compilation of Data for Regulatory Reporting
- Regulatory Notification Report
- Flowchart for Regulatory Notification

Environmental Regulatory Notification Instructions

Overview

The General Manager or his designee is responsible for regulatory notification of any reportable release outside of containment. The multi-step procedure below is meant to serve as a guideline in the event of an accidental release.

Procedure

1. Determination of Release Category

   Go to the Release Category and Reportable Quantities list and determine the release category. This list is specific for materials used or produced at Florence Copper and the release category is indicated for each material.

   - EHS and/or HS Substances
     - If the material is an Extremely Hazardous Substance (EHS) and/or a Hazardous Substance (HS), note the Regulatory Reportable Quantity (RQ). RQ values are based on the pure chemical in question. Since most EHS and HS materials used at our facilities are not in pure form (except for Sulfuric Acid), a calculation must be made in order to determine the amount of pure chemical released. The fifth column of the Release Category and Reportable Quantities List shows the minimum amount of material that would have to be released (in its "as stored") form in order to trigger reporting.
     - Estimate the Quantity Released. Go to "Estimating Release Quantities". Equations provided there can be used for estimating release quantities. Compare the calculated Released RQ with the Regulatory RQ from the Release Category and Reportable Quantities list. Go to step 2 (Flowchart for Regulatory Notification) to determine which agencies must be notified.
   - Non-hazardous Material
     - While non-hazardous materials do not have Regulatory Reportable Quantities, releases of these materials may still be reportable. Go to step 2 (Flowchart for Regulatory Notification) to determine whether reporting is necessary. If reporting is required, the amount released or release should be determined. Equations provided under "Estimating Release Quantities" may be used to prepare an estimate.
   - Petroleum Products
     - Petroleum products do not have Regulatory Reportable Quantities, however, releases of these materials in excess of 25 gallons may still be reportable depending upon the circumstances. Go to the step 2 (Flowchart for Regulatory Notification) to determine whether reporting is necessary. Determination of the quantity released may be made using the equations under "Estimating Release Quantities".

2. Flowchart for Regulatory Agency Notification

   Go to this chart. Using the release category determined in step 1, determine which regulatory agencies must be notified. It is possible that an incident may not require notification of regulatory authorities, this can be determined from the flowchart.

3. Information Requirements

   Prior to making notification, the form "Compilation of Data for Environmental Regulatory Notification" should be completed (copies of the blank form may be made as needed). The data on this form can be used to respond to questions from the regulatory person receiving the notification.

4. Agency Phone Numbers

   The phone numbers of all environmental regulatory agencies requiring notification are compiled on the "Environmental Regulatory Agency Phone Numbers" list.

5. Regulatory Notification

   When contacting the agency representative, indicate that you wish to report a release of whatever material was released. The agency person will then proceed to ask for the information required. The "Environmental Regulatory Notification Report" form must be completed separately for each agency contacted. Copies of the blank form may be made as needed.

Release Category & Reportable Quantity

CAS No.	Material	Release Category[a]	Pure Material Regulatory RQ[b], lbs.	Notification Trigger, as stored
	Sulfuric Acid, 93-100%	EHS	1000	65 gals.
	HI POINT 90-Methyl Ethyl Ketone Peroxide		10	2.8 gals
	Hydrated Lime			NA
64742-47-8	Orfom SX-11			NA
8002-05-9	Petroleum Products			25 gals
7681-52-9	Sodium Hypochlorite (Bleach) 12.5%		100	58 gals.
174333-80-3 64742-47-8	ACORGA M5774- Benzaldehyde 30-60% Petroleum distillates, Lt., 7-13%		10 -	10 gals 25 gals
64742-47-8	Petroleum distillates, Lt., 100%	Petroleum Products	-	25 gals
-	Pregnant Liquor Soln.			Concn. Dependent[c]
-	Raffinate (1% SO_4)		1000	3600
NA	Hazardous Waste	HS	Per Code	
	D001 Ignitable			
	D002 Corrosive			
	DXXX Dissolved Copper			
NA	Oil, Misc. Petrol. Prods	Petroleum Products	-	25 gals
74-98-6	Propane	Petroleum Products	-	-
NA	Used Oil	Petroleum Products	-	25 gals
68334-30-5	Diesel fuel	Petroleum Products	-	25 gals
NA	Transformer fluid, non-PCB (mineral oil)	Trans. Fluid	-	25 gals

[a] EHS = Extremely Hazardous Substance
HS = Hazardous Substance

[b] RQ = Reportable Quantity

[c] Calculate based on analysis of release sample

[d] Depends on the mixture

Estimating Release Quantities

The procedures described below are only applicable to liquid releases. Estimation of gaseous releases (e.g., propane, chlorine, etc.) should be referred to a member of the environmental staff.

1. **Calculate the area covered by the release:**

   For areas that are approximately rectangular or square, the coverage is calculated as follows:

   Area = length x width (in feet)

   Example:

   Length = 40 ft., width = 50 ft.
   Area = 40 x 50 = 2000 ft^2
   = 2000 ft^2

   For areas that are approximately circular, the coverage is calculated as follows:

$$Area = \pi \frac{d^2}{4}$$

   Where π = 3.1416
   D = diameter of the liquid pool in feet

   Example:

   Diameter = 15 ft.

$$Area = \frac{3.1416 \text{ x } 15^2}{4}$$

   = 176.7 ft^2

2. **Calculate the volume (in cubic feet) of liquid released:**

   Multiply the area covered by the depth of the liquid

   $Volume_{cubic\ feet}$ = area x depth

   Example:

   Area = 176.7 ft^2, depth = 3 inches (Note: depth in inches must be converted to depth in feet)

   $Volume_{cubic\ feet}$ = 176.7 ft^2 x 3 inches (x 1 foot/12 inches)
   = 176.7 ft^2 x 3/12 ft.
   = 44.18 ft^3

3. **Calculate the volume (in gallons) of the release:**

$$Volume_{gallons} = Volume_{cubic\ feet} \times 7.48\ gallons/ft^3$$

Example:

$$Volume_{gallons} = 44.18\ ft^3 \times 7.48\ gallons/ft^3$$
$$= 330.5\ gallons$$

4. **Determine the weight (in pounds) of the liquid released as follows:**

$$Weight = Volume_{gallons} \times 8.33\ lbs./gallon \times specific\ gravity\ of\ the\ liquid$$

Example:

$$Weight = 330.5\ gallons \times 8.33\ lbs./gallon \times 1.5$$
$$= 4130\ lbs.$$

Note: typical specific gravity values for the following materials are:

Sulfuric Acid 96-98% = 1.8
Water = 1.0

An exact measurement of the specific gravity of a sample of the released material should be obtained whenever safely possible.

5. **Determine the concentration of the hazardous or extremely hazardous substance (if applicable) in the released material.**

This can be determined from process knowledge, from an SDS, or by laboratory analysis of a sample of the material.

6. **Estimate the released Quantity (if applicable) to determine if regulatory reporting is required**

Quantity = Weight of the released material x concentration of hazardous chemical

Example:

Weight = 4130 lbs., concn. = 50% = 0.50
Released Quantity = 4130 lbs. x 0.50
= 2065 lbs.

Environmental Regulatory Agency Phone Numbers

Agency	Phone No.
Arizona DEQ, Emergency Response Unit	Release: 602-771-2330 or 800-234-5677; Emergency: 602-390-7894
National Response Center, USCG/USEPA	800-424-8802
Pinal County Local Emergency Planning Coord	520-866-6684
Arizona Department of Public Safety (Sherriff)	602-223-2000
OSHA	602-514-7250

Taseko Corporate Phone Numbers

Corporate Group	Phone No.
John McManus – Chief Operating Officer	Office: 778-373-4552 Cell: 604-763-3702
Rob Rotzinger – Vice President, Capital Projects and Corporate Crisis Chair	Office: 778-373-4570 Cell: 604-506-5490
Brian Battison – Vice President, Corporate Affairs and Corporate Crisis Media Relations & Communications Coordinator	Office: 778-373-4543 Cell: 604-961-9170
Richard Weymark – Chief Engineer and Corporate Crisis Coordinator	Office: 778-373-4564 Cell: 250-574-4308

Environmental Response Contractor Phone Numbers

Company	Phone No.
Clean Harbors, 4004 W. Earhart Way, Chandler, AZ 85226 (Preferred Provider)	480-545-2777
Environmental Response Inc., 2202 W. Medtronic Way, Ste. 108 Mesa, AZ 85281	480-967-2802

Management Compilation of Data for Environmental Regulatory Agency Notification

Date:_____

Name of company representative contacting the regulatory agencies:_____

Phone number where this person can be reached: _____

Company Name: Florence Copper, Inc.
Mailing Address: 1575 W Hunt Hwy
City/State/Zip: Florence, AZ 85132

Facility Location:

Latitude/Longitude	Legal Description
33° 03' 00" N / 111° 25' 00" W	Township 4S, Range 9E, Sections 26, 27, 28, 33, 34, and 35, NE¼, NE¼, SE ¼ of the Gila and Salt River Base Line and Meridian

Date of release: _____ Time release was discovered: _____

Name of person discovering the release: _____

Material released: _____ CAS No. (if applicable): _____

Regulatory Reportable Quantity (RQ): _____

Preliminary estimate of amount discharged (Released RQ):

_____

Is the discharged material an Extremely Hazardous Substance (EPRCA Sect. 302)? _____

If yes:

- Identify known acute or chronic health risks (refer to SDS): _____
- What pertinent medical advice was issued: _____

If the discharged material is a hazardous waste, indicate its waste code: _____

Medium the material was released to: (air, water, land): _____

Waterway affected, if any: _____

Was the discharge controlled by a permanent secondary containment structure (diked area)? _____

Estimate of amount reaching water (if applicable): _____

Cause of release: _____

_____

_____

Action take to contain, control, and cleanup the discharge: _____

_____

_____

~~FCI—EMERGENCY RESPONSE PLAN~~

Compilation of Data for Environmental Regulatory Agency Notification

(complete separately for each agency)

Date of Notification: _____

Time of Notification: _____

Agency Contacted: _____

Name of Person Contacted: _____

Information Reported:

_____

_____

_____

_____

_____

_____

_____

_____

Instructions Received:

_____

_____

_____

_____

_____

_____

_____

_____

Comments Received:

_____

_____

_____

_____

_____

_____

_____

_____

Printed Name: _____

Signature: _____

Florence Copper, Inc. Contingency and Emergency Response Plan